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Remarks/Arguments

Claims 1-10 are pending in this application, and are rejected in the Office Action of July 25, 2007. Claims 1-2 and 4-10 are amended herein to more particularly point out and distinctly claim the subject matter Applicants regard as the invention.

Re: Objection to Claim 4

Claim 4 is objected to because of an informality on lines 10-12 thereof. This objection is deemed moot in view of the amendment to claim 4 provided herein. Accordingly, withdrawal of the objection is respectfully requested.

Re: Rejection of Claims 1, 2, 4-10 under 35 U.S.C. §102(b)

Claims 1, 2 and 4-10 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,761,054 issued to Kuhn (hereinafter, "Kuhn"). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants note that independent claims 1 and 4, as amended herein, include:

"providing a port formed in the host device, the port allowing the information-storing device to be inserted into and removed from the host device by a user;

providing a port cover having a conductor formed therein along a path substantially encompassing an area between spaced edges of the port cover, wherein the port cover is moveable between a first position in which the port cover blocks the port and a second position in which the port cover enables access to the port" (emphasis added; see claim 1), and

"a host device capable of accessing information stored in the smart card, the host device including a housing having a port formed therein, the port allowing the smart card to be inserted into and removed from the host device by a user, wherein when the smart card is inserted into the port, information can be transferred from the smart card to the host device;

a port cover removably coupled to the housing surrounding the port, wherein the port cover is moveable between a first position in which the port cover physically blocks the port and a second position in which the port cover does not physically block the port" (emphasis added; see claim 4)

As indicated above, amended independent claims 1 and 4 respectively define a method and apparatus in which a port formed in a host device allows an information-storing device to be inserted into and removed from the host device by a user. A port cover having a conductor formed therein is also provided. The port cover is moveable between a first position in which the port cover blocks the port and a second position in which the port cover enables access to the port. Support for the above-referenced features may be found, for example, on page 3, lines 19-21, page 4, lines 12-16, page 5, lines 25-26, page 6, lines 11-13 and/or page 8, lines 3-6 of Applicants' specification.

Kuhn fails to teach or suggest, *inter alia*, the above-referenced features of independent claims 1 and 4. In formulating the instant rejection, the Examiner alleges that integrated circuit die 14, substrate 15 and printed circuit board 20 of Kuhn correspond to the claimed "host device" (see pages 2-3 of Office Action dated July 25, 2007). In response, Applicants note that Kuhn fails to teach or suggest that integrated circuit die 14, substrate 15 and printed circuit board 20 (i.e., the alleged "host device") include a "port" that allows an information-storing device/smart card to be inserted into and removed from the port by a user, as claimed. Accordingly, for this reason alone, Kuhn fails to anticipate independent claims 1 and 4 and their respective dependent claims.

The Examiner further alleges that flexible circuit 12 of Kuhn corresponds to the claimed "port cover" (see pages 2-3 of Office Action dated July 25, 2007). In response, Applicants note that Kuhn fails to teach or suggest that flexible circuit 12 (i.e., the alleged "port cover") is adapted to be moveable back and forth between a first position in which the port cover blocks the port and a second position in which the port cover does not block the port, as claimed. Rather, Kuhn expressly teaches that:

"The flexible circuit 12 may be bonded to the integrated circuit 14 with an adhesive that [sic, is] stronger than the material of the flexible circuit 12, or the integrated circuit 14, so that any attempt to unwrap the flexible circuit 12 from the die 14 will result in destruction of the integrated circuit 14, or the separation of the polyamide and conductive trace 18 so that the conductive trace 18 remains attached to the die 14." (emphasis added; see column 2, lines 35-42)

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As indicated above, Kuhn ostensibly teaches that the adhesive bonding connection between flexible circuit 12 and integrated circuit 14 is of a permanent nature. As such, Kuhn fails to teach or suggest, and actually teaches away from, flexible circuit 12 (i.e., the alleged "port cover") being moveable between a first position in which the port cover blocks the port and a second position in which the port cover does not block the port, as claimed. Accordingly, for the foregoing reasons, claims 1, 2 and 4-10 are deemed patentable over Kuhn and withdrawal of the rejection is respectfully requested.

Re: Rejection of Claim 3 under 35 U.S.C. §103(a)

Claim 3 is rejected under 35 U.S.C. §103(a) as being unpatentable over Kuhn. Applicants respectfully traverse this rejection for at least the same reasons stated above in conjunction with claims 1, 2 and 4-10 since Kuhn fails to teach or suggest, *inter alia*, the "port" and "port cover" defined by independent claim 1 (from which claim 3 depends). Accordingly, withdrawal of the rejection of claim 3 is respectfully requested.


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Conclusion

In view of the foregoing remarks/arguments and accompanying amendments, the Applicant believes this application stands in condition for allowance. Accordingly, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the Applicant's attorney at (609) 734-6815, so that a mutually convenient date and time for a telephonic interview may be scheduled. No fee is believed due. However, if a fee is due, please charge the fee to Deposit Account 07-0832.

Respectfully submitted,


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